

**Annual 47 C.F.R. 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018

Date filed: February 14, 2019

Name of company covered by this certification: CAP Cable, LLC

Form 499 Filer ID: 828651

Name of signatory: Jeremy Bals

Title of signatory: Chief Operating Officer

I, Jeremy Bals, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. 64.2001 et. seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et. seq.* of the Commission's rules.

The company has not taken any action (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g. instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed: \_\_\_\_\_

A handwritten signature in black ink, appearing to read "JBals", is written over a horizontal line.

# CPNI – Customer Proprietary Network Information

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## *Certification Statement*

USA Companies enforces the following procedures regarding protection for our phone customers:

- 1.) Obtain the name of individual on the account
- 2.) If the person on the phone is not the account holder, obtain the name of the individual calling
- 3.) Obtain the phone number
- 4.) Verify the address and the 'Bill to Address' (BTA)
- 5.) Obtain the last 4 digits of the social security number of the account holder
  - a. If the individual is not the account holder, that individual is not allowed to make changes to a pending work order or to the account
- 6.) If a customer is calling for CPNI related information, we refer them to Momentum (phone provider) to obtain his/her online records. A password is required in order to obtain phone records online.
- 7.) If a customer is unable to access Momentum, CPNI can only be obtained with the following:
  - a. USA Companies can send phone call records to the address of record or by calling the customer at the telephone of record.
  - b. USA Companies can provide all CPNI to customers based on in-store contact with a valid photo ID.
- 8.) For businesses, USA Companies will only provide CPNI information to the business owner.

USA Companies also enforces the additional standards for our customers:

- 1.) We do not sell or provide any unrelated third party information regarding our customers.
- 2.) On-line access to CPNI is protected by a password pin number established by the customers and maintained by our carrier, Momentum.
- 3.) Notification to our customers and law enforcement is provided in instances of breaches of confidentiality.
- 4.) All Customer Service Representatives and Technical Support staff are trained on the above requirements.
- 5.) The CSR and Technical Support managers routinely listen to staff calls with customers to ensure the above procedures are maintained.
- 6.) All information kept on our servers are protected by our network firewalls and maintained by our Information Technology Officer. We also provided internal network security mechanisms.